



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

217/782-9881

EPA Region 5 Records Ctr.



362904

March 1, 2002

Dion Novak
Remedial Project Manager, SR-6J
U.S. EPA, Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Draft Preliminary Site Evaluation Report,
Eagle Zinc NPL Site

1358070001 -- Montgomery Co.
Eagle Zinc
Superfund/Technical Report

Dear Mr. Novak:

The Illinois Environmental Protection Agency (Illinois EPA) has completed its review of Environ's February 13, 2002, Draft Preliminary Site Evaluation Report. The Illinois EPA's review comments follow the format of the submitted document.

III. ENVIRONMENTAL SETTING

D. Geology

- In this subsection, page 6 and 7, it is stated that based on "maps contained in the document entitled *Potential for Contamination of Shallow Aquifers in Illinois* (ISGS, 1984), the geologic materials underlying the Site are... described as 'uniform, relatively impermeable silty or clayey till at least 50 feet thick, with no evidence of interbedded sand or gravel'."

Is this information actual meant for the entire area, as opposed to being specific to the Site? What was below the depth of 13 feet, according to the well logs? To we have any information or adequate information to truly

GEORGE H. RYAN, GOVERNOR

determine that there is no evidence of interbedded sand or gravel in the till?

E. Hydrogeology

- This subsection on pages 7 and 8 discusses water supply drinking wells located within a one-mile radius of the site. The One Mile Well Search Map in attachment A indicates that there is one drinking or water supply well located north of the Site, and apparently within a few hundred or so feet of the Site. The map, however, does not include distance information. Also, the narrative does not appear to address this well to any extent.
- Also, a drive-by reconnaissance of adjoining properties does not appear to be adequate to determine if there are any wells present on the properties.

IV. SITE HISTORY AND OPERATIONS

Although this section (pages 9-14) provides a basic overview of the Site's history and operations, the following subsections do not provide information on Site wastes:

- B. Description of Historical Operations**
- C. General Description of Zinc Oxide Manufacturing Process**
- D. Description of Current Operations**

In the section, the subsections, especially subsection **E. Residual Materials** need to define terms such as "Residual Materials".

V. REGULATORY HISTORY

In this section (pages 15-16) there does not appear to be any information on the RCRA and Solid Waste regulatory history with the Illinois EPA. I believe the RCRA information is pertinent to the CERCLA history too.

VI. EVALUATION OF EXISTING DATA

An explanation is needed in this section (17-22) as to what TACO is and in what manner Tier 1 is applicable to CERCLA. The Illinois EPA generally uses Tier 3. An explanation is needed in regard to the various TACO tiers.

- B. Sediment**

- Information on VOCs and PCBs sampling results was not included in this subsection (pages 19-20).

E. Ground Water

- This subsection (pages 21-22) appears to be lacking in adequate detail.

VII. SITE INSPECTION AND ACCESS

More details on inspection procedures and results are needed in this section. It appears that the monitoring wells were visually inspected, but a checklist was not included.

VIII. SITE CONCEPTUAL MODEL

Is the Site Conceptual Model acceptable?

This concludes the Illinois EPA's comments. If you have any comments or questions, please contact me at the above address. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Rick B. Lanham". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rick Lanham, Project Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land